

**From:** [Carl Bolden](#)  
**To:** [Barbara Aldridge](#)  
**Subject:** Fw: Gulfco  
**Date:** 05/12/2008 09:51 AM  
**Attachments:** [Gulfco Final Offer.doc](#)

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FYI

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Carl Bolden  
Remedial Enforcement First Coordinator  
Superfund Technical Enforcement Branch  
U.S. Environmental Protection Agency  
Region 6  
Dallas, Texas  
214-665-6713 (ph)  
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[bolden.carl@epa.gov](mailto:bolden.carl@epa.gov)

----- Forwarded by Carl Bolden/R6/USEPA/US on 05/12/2008 09:47 AM -----

**Barbara  
Nann/R6/USEPA/US**

05/12/2008 09:44 AM

To Garyg Miller/R6/USEPA/US@EPA, Carl  
Bolden/R6/USEPA/US@EPA  
CC  
Subject Fw: Gulfco


I think this is the latest.

Barbara A. Nann  
Assistant Regional Counsel  
EPA Region 6 (6RC-S)  
1445 Ross Avenue  
Dallas, TX 75202  
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----- Forwarded by Barbara Nann/R6/USEPA/US on 05/12/2008 09:44 AM -----

**Sam  
Coleman/R6/USEPA/US**

05/09/2008 02:23 PM

To Jennifer Wilbur/DC/USEPA/US@EPA  
cc Amy Legare/DC/USEPA/US@EPA, Barbara  
Nann/R6/USEPA/US@EPA, Ben  
Harrison/R6/USEPA/US@EPA, Kenneth  
Patterson/DC/USEPA/US@EPA, Mark  
Peycke/R6/USEPA/US@EPA, [mulkey.marcia@epa.gov](mailto:mulkey.marcia@epa.gov),  
Scott Sherman/DC/USEPA/US@EPA  
Subject Re: Gulfco 

OK


Samuel Coleman, P.E.  
Director, Superfund Division Region 6  
214 665-6701  
214 789-2016 (cell)  
coleman.sam@epa.gov

▼ Jennifer Wilbur/DC/USEPA/US

**Jennifer  
Wilbur/DC/USEPA/US**

05/09/2008 02:10 PM

To Sam Coleman/R6/USEPA/US@EPA  
cc Amy Legare/DC/USEPA/US@EPA, Barbara  
Nann/R6/USEPA/US@EPA, Ben  
Harrison/R6/USEPA/US@EPA, Kenneth  
Patterson/DC/USEPA/US@EPA, Mark  
Peycke/R6/USEPA/US@EPA, mulkey.marcia@epa.gov,  
Scott Sherman/DC/USEPA/US@EPA

Subject Re: Gulfco 

Sam,

Thank you for forwarding. The edits are fine, however, we have two small tweaks.

1) 2nd paragraph, 3rd sentence, please insert "surface of the" before "southern portion based on..."

2) 2nd paragraph, 3rd sentence, at the end, please replace the "(RI/FS)" with "(RI)" and add at the end "relating to that portion of the site."

Thank you.

Jennifer


Jennifer Millett Wilbur  
Special Assistant  
Office of Solid Waste and Emergency Response  
US Environmental Protection Agency  
1200 Pennsylvania Ave., NW MC 5101T  
Washington, DC 20460  
(202) 566-2756

▼ Sam Coleman/R6/USEPA/US

Sam  
Coleman/R6/USEPA/US

05/09/2008 10:12 AM

To Jennifer Wilbur/DC/USEPA/US@EPA  
cc Jennifer Wilbur/DC/USEPA/US@EPA, Scott  
Sherman/DC/USEPA/US@EPA, Kenneth  
Patterson/DC/USEPA/US@EPA, Amy  
Legare/DC/USEPA/US@EPA, mulkey.marcia@epa.gov,  
Barbara Nann/R6/USEPA/US@EPA, Mark  
Peycke/R6/USEPA/US@EPA, Ben  
Harrison/R6/USEPA/US@EPA

Subject Re: Gulfco 

My folks would like to see a couple of edit

James C. Morriss III  
Thompson & Knight LLP  
1900 San Jacinto Center  
98 San Jacinto Boulevard  
Austin, Texas 78701-4081

RE: Gulfco Marine Maintenance Superfund Site in Freeport Texas

Dear Mr. Morriss:

Thank you for your April 9, 2008 letter. I appreciate the efforts to date of [insert names of PRPs] in working toward the successful cleanup and reuse of the Gulfco Marine Maintenance Superfund Site (Gulfco Site). Toward that end, the Environmental Protection Agency (EPA) wants to work with the PRPs to, at a minimum, complete the work necessary to prepare the southern portion of the site for potential revitalization and possibly to have a construction completion for the entire Gulfco Site by the end of this fiscal year.

Along these lines, I recently met with senior representatives of the Office of Solid Waste and Emergency Response and the Office of Enforcement and Compliance Assurance to explore a path forward for both the contemplated removal action at the southern portion and completion of work at the entire site. As a result of this meeting, we envision the PRPs undertaking a) removal at the southern portion **under a removal Administrative Order on Consent (AOC)** and b) entering into a consent decree (CD) for the entire site. Upon completion of the removal, and **In** support of the Agency's revitalization goals, we **EPA** will consider partial deletion of the southern portion based upon the removal work and the remedial investigation (RI/FS). Concurrent with the removal work, the PRPs **will** expeditiously complete the RI/FS of the entire site, including full investigation of the groundwater. This overall commitment would be recorded in a CD and would include reimbursement of all past and future costs. We are hopeful **that this** effort could **will** lead to construction completion in this fiscal year.

To get this process started, we have developed a schedule for your prompt review, **and we are expeditiously preparing a model CD (We previously sent you a draft AOC for the removal)**. Because progress is time-sensitive, we ask that you keep requested changes to the model CD **and removal AOC** to a minimum. I am enclosing the schedule EPA drafted that contemplates completing construction on the site by the end of this fiscal year taking into account all of EPA's internal requirements, all sampling data required for the Record of Decision in order to delete the site, and payment of all past and future costs. EPA is open to submittal of a schedule created by your client that achieves a construction completion by the end of this fiscal year. I encourage you to review the documents as a potential path forward.

I am excited about the potential for a construction completion of the Gulfco Site for the end of this fiscal year. If you share EPA's interest in completing the cleanup of the Gulfco Site by October 2008, please submit a schedule contemplating this achievement or in the alternative submit your assent to the enclosed schedule. If you have any questions, please contact Barbara Nann, Gulfco Site attorney at 214-665-2157.

Samuel Coleman, P.E., Director,  
Superfund Division, (6SF)

Enclosure



**Gulfco Final Offer.doc**

Samuel Coleman, P.E.  
Director, Superfund Division Region 6  
214 665-6701  
214 789-2016 (cell)  
coleman.sam@epa.gov

▼ Jennifer Wilbur/DC/USEPA/US

Jennifer  
Wilbur/DC/USEPA/US

To Sam Coleman/R6/USEPA/US@EPA  
cc Scott Sherman/DC/USEPA/US@EPA, Jennifer  
Wilbur/DC/USEPA/US@EPA

05/07/2008 11:36 AM

Subject



Re: Gulfco


here's the letter - if you have any other edits, if you wouldn't mind sending up first that would be great.

Thank you

[attachment "gulfco.doc" deleted by Sam Coleman/R6/USEPA/US]

Jennifer Millett Wilbur  
Special Assistant  
Office of Solid Waste and Emergency Response  
US Environmental Protection Agency  
1200 Pennsylvania Ave., NW MC 5101T  
Washington, DC 20460  
(202) 566-2756

▼ Sam Coleman/R6/USEPA/US

**Sam  
Coleman/R6/USEPA/US** To Jennifer Wilbur/DC/USEPA/US@EPA  
cc  
05/07/2008 09:30 AM Subject Re: Gulfco 

Will do.

Samuel Coleman, PE  
Superfund Div Region 6  
214.665.6701 Ofc  
214.789.2016 Cell  
Sent by EPA Wireless E-Mail Services

▼ Jennifer Wilbur

----- Original Message -----

**From:** Jennifer Wilbur  
**Sent:** 05/07/2008 10:51 AM EDT  
**To:** Sam Coleman  
**Subject:** Re: Gulfco

No you did not - didn't have time yesterday to complete - will try to finish today and will send to you shortly thereafter

On a different note, it was a pleasure putting the face to the name. Also, if you speak with Desi, please send him my regards.

▼ Sam Coleman

----- Original Message -----

**From:** Sam Coleman  
**Sent:** 05/07/2008 10:25 AM EDT  
**To:** Jennifer Wilbur  
**Subject:** Gulfco

I did not see that I received the redraft. Did I miss something?

Samuel Coleman, PE  
Superfund Div Region 6  
214.665.6701 Ofc  
214.789.2016 Cell  
Sent by EPA Wireless E-Mail Services